

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LYNDA GOMEZ)	
)	
)	
Plaintiff,)	08 CV 3042
)	
vs.)	
)	
MIDLAND FUNDING,LLC,)	
MIDLAND CREDIT MANAGEMENT, INC)	Judge Lefkow
BLATT, HASENMILLER, LEIBSKER &)	
MOORE, LLC)	Magistrate Judge Brown
)	
Defendants.)	

**DEFENDANT BLATT, HASENMILLER, LEIBSKER & MOORE, LLC, MIDLAND
FUNDING LLC AND MIDLAND CREDIT MANAGEMENT, INC'S AGREED MOTION
FOR EXTENSION OF TIME TO RESPOND TO
RESPOND TO PLAINTIFF'S COMPLAINT**

NOW COMES Defendants Blatt, Hasenmiller, Leibsker & Moore, LLC ("Blatt"),
Midland Funding, LLC and Midland Credit Management, Inc. ("Midland") by and through its
undersigned attorneys, and for its Motion for Extension of Time to Respond to plaintiff's
Complaint, states as follows:

1. Plaintiff filed this complaint on May 27, 2008 and served it upon Blatt on June 2,
2008 and on Midland on June 10, 2008.
2. Blatt's responsive pleading to the Complaint is due on June 23, 2008 and
Midland's response is due on June 30, 2008
3. Blatt and Midland need an additional twenty (28) days, until July 21, 2008, to
review relevant documents, retain counsel, and prepare their responses to plaintiff's complaint.

5. Plaintiff has agreed to an extension of time until July 21, 2008.

6. Therefore, Blatt and Midland request additional time, up to and including July 21 2008, to file their responsive pleading to plaintiff's Complaint.

7. This is Blatt's and Midland's first request for an extension of time.

WHEREFORE, Defendants respectfully requests this Court grant an extension of time, up to and including July 21, 2008, for defendant to file their responsive pleading to plaintiff's Complaint and award whatever further relief this Court deems just and appropriate.

Dated: June 23, 2008

Respectfully Submitted,

BLATT, HASENMILLER, LEIBSKER &
MOORE, LLC, MIDLAND FUNDING, LLC,
AND MIDLAND CREDIT MANAGEMENT,
INC.

By: /s/ Gregory R. Dye
One of its Attorneys

BLATT, HASENMILLER, LEIBSKER &
MOORE, LLC
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CERTIFICATE OF SERVICE

I hereby certify that on June 23, 2008, I electronically filed the foregoing **DEFENDANTS AGREED MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Keith J. Keogh
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